

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

CHERYL REASE,	)	
	)	
Plaintiff,	)	
	)	CIVIL ACTION NO.
v.	)	
	)	1:11-CV-03513-RLV
MHM CORRECTIONAL SERVICES	)	
INC. AND WILLIAM	)	
BRICKHOUSE, Ph.D., an individual,	)	
	)	
Defendants.	)	

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**DEFENDANTS' MOTION TO COMPEL**

Defendants MHM Correctional Services, Inc. (“MHM”) and William Brickhouse, Ph.D. (“Dr. Brickhouse”) (collectively “Defendants”), through their undersigned counsel, and pursuant to Rule 37 of the Federal Rules of Civil Procedure and Rule 37.1 of the Civil Local Rules for the Northern District of Georgia respectfully move for an order compelling Plaintiff Cheryl Rease (“Plaintiff” or “Rease”) to respond to Defendants’ interrogatories and produce certain documents. Defendants move the Court for entry of an Order compelling Plaintiff to respond to Defendants’ interrogatories and produce certain documents for the following reasons:

1. Defendant MHM served its First Interrogatories and First Request for Production of Documents upon Plaintiff on December 23, 2011 with Plaintiff's responses due by January 25, 2012.
2. This Court ordered a stay on all deadlines, including discovery, on January 24, 2012 in order that the parties may attempt to mediate the claims.
3. The parties reached no resolution in mediation, and the Court lifted its prior stay with discovery commencing on April 1, 2012.
4. After the stay was lifted, Defendants requested that Plaintiff respond to their First Discovery Requests by April 13, 2012, and Plaintiff agreed in good faith to respond to Defendants' discovery requests in a timely fashion.
5. On May 2, 2012, Plaintiff requested an extension to respond to discovery until May 11, 2012, to which Defendants agreed.
6. Plaintiff finally mailed her discovery responses and objections on May 18, 2012, a week after her extension expired, which Defendants did not receive until May 23, 2012.
7. On May 25, 2012, defense counsel sent Plaintiff's counsel a good faith letter identifying specific deficiencies in Plaintiff's discovery responses and requested that Plaintiff supplement her responses by June 1, 2012. Defense counsel certifies

she conferred in good faith with Plaintiff's counsel in compliance with Rule 37 of the Federal Rules of Civil Procedure.

8. To date, Plaintiff has not produced any documents, supplemented any of her discovery responses, or prepared any response to defense counsel's good faith letter.

9. Plaintiff has left Defendants with no choice but to seek judicial intervention compelling Plaintiff to comply with her discovery obligations pursuant to the Federal Rules of Civil Procedure.

For the reasons set forth herein and in the accompanying brief, Defendants respectfully request that the Court order Plaintiff to respond to the discovery requests at issue and award Defendants their fees and costs in connection with filing this Motion.

Respectfully submitted this June 26, 2012.

/s/ Natasha L. Wilson  
GREENBERG TRAURIG, LLP  
Terminus 200  
3333 Piedmont Road, NE, Suite 2500  
Atlanta, Georgia 30305

Todd D. Wozniak, Georgia Bar No. 777275  
Tel. (678) 553-7326  
Fax (678) 553-7327  
*wozniakt@gtlaw.com*

Natasha L. Wilson, Georgia Bar No. 371233  
Tel. (678) 553-2182  
Fax (678) 553-2183  
*wilsonn@gtlaw.com*

**ATTORNEYS FOR DEFENDANTS  
MHM CORRECTIONAL SERVICES INC. AND  
WILLIAM BRICKHOUSE, PH.D.**

**CERTIFICATE OF COMPLIANCE WITH L.R. 5.1B**

I HEREBY CERTIFY that the foregoing was prepared in Times New Roman, 14-point font, as approved by Local Rule 5.1B.

/s/ Natasha L. Wilson

Todd D. Wozniak  
Georgia Bar No. 777275  
WozniakT@gtlaw.com  
Tel. (678) 553-7326  
Fax (678) 553-7327  
Natasha L. Wilson  
Georgia Bar No. 371233  
WilsonN@gtlaw.com  
Tel. (678) 553-2182  
Fax. (678) 553-2183

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**CERTIFICATE OF SERVICE**

This is to certify that I have filed a true and correct copy of the foregoing with the Clerk of the Court using the CM/ECF system, and served a copy of the DEFENDANTS' MOTION TO COMPEL to all counsel of record identified via Notices of Electronic Filing generated by CM/ECF:

Clifford H. Hardwick  
Roswell Professional Park  
11205 Alpharetta Highway, Suite E-1  
Roswell, GA 30076

This 26th day of June, 2012.

/s/ Natasha L. Wilson